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ROOTS READY MADE GARMENTS CO. W.L.L.

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

ROOTS READY MADE GARMENTS CO.
W.L.L.,

Plaintiff,

v.

THE GAP, INC., a/k/a, GAP, INC., GAP
INTERNATIONAL SALES, INC., BANANA
REPUBLIC, LLC, AND OLD NAVY, LLC,

Defendants.

Case No: C 07 3363 CRB

NOTICE OF ERRATA

Date: August 29, 2008

Time: 10 o'clock a.m.

Place: Courtroom 8, 19th Floor

Judge: Charles R. Breyer

PUBLIC VERSION

1 Plaintiff Roots Ready Made Garments Co. W.L.L. (“Roots”) submits
2 this Notice of Errata to correct the following citations in Roots’ Opposition to
3 Defendants’ Motion for Summary Judgment (“Opposition Brief”) and omissions
4 in the Declaration of Bradley J. Nash in Support of Plaintiff’s Opposition to
5 Defendants’ Motion for Summary Judgment (“Nash Declaration”):

- 6 1. In the Opposition Brief at page 1, the following sentence has an incorrect
7 citation: “Following a change in Gap’s management, in 2002, Gap
8 demanded that Solka pay immediately for the remaining inventory.”
9 The correct citation following this sentence is: Exh. C, 22:2-23:10.
- 10 2. In the Opposition Brief at pages 1-2, Roots inadvertently omitted citation
11 to a document after the sentence: “When asked whether Gabana had any
12 facilities in the Middle East, Solka’s principal, Jacques Fabre, who at
13 one point served as the President of Gabana, responded as follows: ‘A.
14 (Laughs). No. . . . They had an office in Geneva, but that’s all.’” A true
15 and correct copy of this document is attached hereto as Exhibit 1 to the
16 Notice of Errata.
- 17 3. In the Opposition Brief at page 2, the following sentence has an incorrect
18 citation: “When asked whether Mr. Larsen had any expertise selling
19 garments in the Middle East, Mr. Fabre was similarly unequivocal: ‘A
20 (Laughs). We are wasting . . . time. No.’” The correct citation
21 following this sentence is: Exh. C, 34:1-2.
- 22 4. In the Opposition Brief at page 2, the citation to Exhibit C after the
23 following sentence is incorrect: “Bell promised that in exchange for
24 purchasing the inventory, Roots would receive ISP rights in ‘all the
25 Arabic-speaking countries.’” The correct citation to Exhibit C is: Exh.
26 C, 30:2-3.
- 27 5. In the Opposition Brief at page 3, the citation to Exhibit F after the
28 following sentence is incorrect: “Jim Bell informed Roots that Gap did

not wish to make sales directly to a Middle Eastern Company.” The correct citation to Exhibit F is: Exh. F, 132:23-25.

6. In the Opposition Brief at page 5, Roots’ inadvertently cited an incorrect page number after the sentence: “In June 2003, Roots representatives, including Abu Issa, traveled to San Francisco for a Gap collection presentation.” The correct citation following this sentence is: Exh. E, 196:20-22.
7. In Exhibit E to the Nash Declaration, Roots inadvertently omitted page 196. A true and correct copy of page 196 to Exhibit E of the Nash Declaration is attached hereto as Exhibit 2 to the Notice of Errata.
8. In Exhibit F to the Nash Declaration, Roots inadvertently omitted page 84. A true and correct copy of page 84 to Exhibit F of the Nash Declaration is attached hereto as Exhibit 3 to the Notice of Errata.

DATED: August 13, 2008

COVINGTON & BURLING LLP

By: /s/ Bradley J. Nash
Bradley J. Nash

*Attorneys for Plaintiff Roots Ready
Made Garments Co. W.L.L.*